

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

NICHOLE HARRIS, on behalf of The Suter Company, Inc. Employee Stock Ownership Plan, and on behalf of a class of all other persons similarly situated,

Plaintiff,

v.

**MIGUEL PAREDES,
PRUDENT FIDUCIARY SERVICES, LLC,
a California Limited Liability Company,
TIMOTHY P. SUTER,
GEORGE B. SUTER, and
DANIEL B. SUTER,**

Defendants.

Case No. 3:23-cv-50231

Hon. Iain D. Johnston

Hon. Margaret J. Schneider

JOINT AGREED MOTION TO SET RESPONSIVE PLEADING DEADLINES

Plaintiff Nichole Harris, on behalf of The Suter Company, Inc. Employee Stock Ownership Plan, and similarly situated participants in the Plan and their beneficiaries, and Defendants Migues Paredes, Prudent Fiduciary Services, LLC, Timothy Suter, George Suter, and Daniel Suter, respectfully request that the Court set a single responsive pleading deadline for all Defendants. In support of this agreed motion, the parties state:

1. Plaintiff filed her Complaint in this action on June 6, 2023 (Dkt. 1), and it was transferred to the Western Division on June 20, 2023 (Dkt. 3, 4).

2. Defendants Migel Paredes and Prudent Fiduciary Services, LLC, waived service of process of the Complaint and currently have a responsive pleading deadline of August 21, 2023. (Dkt. 7).

3. Defendant Timothy Suter was served with the Complaint and summons on July 16, 2023 (Dkt. 10) and currently has a responsive pleading deadline of August 7, 2023.

4. On July 28, 2023, counsel for Defendants George Suter and Daniel Suter contacted Plaintiff's counsel and agreed to accept service of the Complaint on behalf of those Defendants, and file a responsive pleading by August 30, 2023.

5. In order to align the responsive pleading deadlines, the parties respectfully request that all Defendants file their responsive pleadings to the Complaint by August 30, 2023.

Dated: August 7, 2023

Respectfully submitted,

BAILEY & GLASSER LLP

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*Attorneys for Defendants Miguel Paredes and
Prudent Fiduciary Services, LLC*

CERTIFICATE OF SERVICE

I certify that on this 7th day of August 2023, a true and correct copy of the foregoing document was filed with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

I further certify that I will e-mail the filed copy of this filing to counsel for the Suter Defendants.

/s/ Patrick O. Muench

Patrick O. Muench